



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

APR 19 2016

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Article Number: 7015 3010 0000 7503 6903

Mr. Bill Graham, Superintendent
Department of Public Works
Borough of North Haledon
37 Willow Brook Court
North Haledon, New Jersey 07508

**Re: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act
Docket No. CWA-IR-16-016
Sanitary Sewer System Compliance Evaluation Inspection
Borough of North Haledon Sanitary Sewer System
NJPDES Tracking ID No. NJP000152**

Dear Mr. Graham:

As part of a joint effort between the United States Environmental Protection Agency ("EPA") and the New Jersey Department of Environmental Protection ("NJDEP") to ensure that the discharge of sanitary sewage is minimized, we conducted a Sanitary Sewer System ("SSS") Compliance Evaluation Inspection ("CEI") of the Borough of North Haledon system on March 16, 2016. Enclosed is a copy of the CEI report detailing EPA's findings.

The EPA is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Within **thirty (30) calendar days** of receipt of this RFI, the Borough is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA a detailed written summary of the steps the Borough has taken or will take to address each of the **Potential N.J.A.C. Non-Compliance Items and Areas of Concern** detailed in the enclosed CEI Report.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to:

Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Internet Address (URL) • <http://www.epa.gov>

Any documents to be submitted by the Borough must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject the Borough to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Additionally, further guidance and information concerning the control of Sanitary Sewer Overflows (SSOs) may be found by accessing the following EPA web site: <https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos>.

If you have any questions, please feel free to contact Ms. Kimberly McEathron, of my staff, at (212) 637-4228 or via email at mceathron.kimberly@epa.gov.

Sincerely yours,



Douglas McKenna, Chief
Water Compliance Branch

w/enclosures

cc: Marcedius Jameson, NJDEP

Randy George, Mayor, Borough of North Haledon

Melissa Hornsby, NJDEP (Melissa.Hornsby@dep.nj.gov)

Rich Paull, NJDEP (Rich.Paull@dep.nj.gov)

Theophilus Ashie, NJDEP (Theophilus.Ashie@dep.nj.gov)

James DeBlock, Licensed Operator (JDeBlock@DeBlockEnvironmental.com)

Robert DeBlock, DeBlock Environmental Services, LLC (RDeBlock@DeBlockEnvironmental.com)

Bridget McKenna, PVSC (BMcKenna@PVSC.com)



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="text"/> 2 <input type="text"/>	3 <input type="text"/> 4 <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 7 <input type="text"/> 8 <input type="text"/> 9 <input type="text"/> 10 <input type="text"/> 11 <input type="text"/>	12 <input type="text"/> 13 <input type="text"/> 14 <input type="text"/> 15 <input type="text"/> 16 <input type="text"/> 17 <input type="text"/>	18 <input type="text"/>	19 <input type="text"/>	20 <input type="text"/>
Remarks					
21 <input type="text"/> 22 <input type="text"/> 23 <input type="text"/> 24 <input type="text"/> 25 <input type="text"/> 26 <input type="text"/> 27 <input type="text"/> 28 <input type="text"/> 29 <input type="text"/> 30 <input type="text"/> 31 <input type="text"/> 32 <input type="text"/> 33 <input type="text"/> 34 <input type="text"/> 35 <input type="text"/> 36 <input type="text"/>					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> 68 <input type="text"/> 69 <input type="text"/>	70 <input type="text"/>	71 <input type="text"/>	72 <input type="text"/>	73 <input type="text"/> 74 <input type="text"/>	75 <input type="text"/> 76 <input type="text"/> 77 <input type="text"/> 78 <input type="text"/> 79 <input type="text"/> 80 <input type="text"/>

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
Borough of North Haledon 37 Willow Brook Court North Haledon, New Jersey 07508	8:00 AM / 03/16/2016	
	Exit Time/Date	Permit Expiration Date
	10:45 AM / 03/16/2016	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Bill Graham, Superintendent, Department of Public Works Borough of North Haledon 37 Willow Brook Court, North Haledon, New Jersey 07508 Phone: (973) 427-5151		
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted	
Bill Graham, Superintendent, Department of Public Works Borough of North Haledon 37 Willow Brook Court, North Haledon, New Jersey 07508 Phone: (973) 427-5151	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input checked="" type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
	USEPA/DECA-WCB/212-637-4228	4/13/2016
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	USEPA/DECA-WCB/212-637-3950	4/14/16

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A	State (Contractor)	O	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B	EPA (Contractor)	P	Other Inspectors, State (Specify in Remarks columns)
C	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
L	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

SANITARY SEWER SYSTEM
COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Borough of North Haledon SSS	
Inspection Date: March 16, 2016	
Inspection Time: 8:00 AM – 10:45 AM	
EPA Inspector: Kimberly McEathron, Physical Scientist, USEPA Region 2, (212) 637-4228	
Borough Representatives: Bill Graham, Superintendent, Department of Public Works, Borough of North Haledon, (973) 427-5151 Robert J. De Block, De Block Environmental Services, LLC, (973) 998-9100	
Other Representative: Bridget McKenna, Chief Operating Officer, Passaic Valley Sewerage Commission, (973) 817-5976	
Site Information: Borough of North Haledon 37 Willow Brook Court North Haledon, New Jersey 07508 NJPDES Tracking ID No. NJP000152	

I. Background and Findings

Collection System:

1. The Passaic Valley Sewerage Commission (PVSC) Wastewater Treatment Plant (WWTP), New Jersey Department of Environmental Protection (NJDEP) New Jersey Pollutant Discharge Elimination System (NJPDES) No. NJ0021016, is a large sized Publicly Owned Treatment Works (POTW).
2. The PVSC WWTP treats separate sanitary sewage from the Borough of North Haledon ("North Haledon" or "Borough").
3. The PVSC and the Borough have an intermunicipal agreement dated August 13, 1980 regarding the conveyance and treatment of sanitary sewage.
4. Downstream from the Borough, the Borough's sanitary sewage flow combines with sanitary sewage from Prospect Park and enters the PVSC owned and operated regulator structure located on Short Street in the City of Paterson. The City of Paterson combined sewage flow also enters this regulator structure from a different pipe connection. Sewage overflows travel from PVSC's regulator structure and discharge to the Passaic River via the City of Paterson Short Street Combined Sewage Overflow (CSO) Outfall (022) (NJPDES No. NJ0105023).

5. The North Haledon force main pumps sanitary sewage flow into the Prospect Park gravity line located in the City of Paterson. The Borough representatives were unable to locate an Intermunicipal Agreement with Prospect Park.
6. Upstream from the Borough, sanitary sewage from a shopping center called Urban Falls in Franklin Lakes, New Jersey connects into the Borough's collection system.
7. The Borough has an agreement with Urban Falls, Inc. dated March 2, 1992 regarding sanitary sewage.
8. The Borough population is approximately 9,200 residents with approximately 52 miles of streets. According to Borough representatives, the Borough consists of primarily residential areas.
9. The Borough Sanitary Sewer System (SSS) consists of separate sanitary sewers with approximately 800 manholes and 65 miles of sewer piping.
10. According to Borough representatives, the Borough SSS was originally constructed 40 years ago and is composed of primarily PVC pipes and the remaining are ductile iron pipes.
11. The Borough SSS map provided at the time of the inspection was a series of scanned drawings dated "revised 1981". The drawings depict manholes and pipe segments built prior to 1981. According to Borough representatives, SSS constructed after 1981 would be depicted in as-built drawings, plans and specifications and the Borough has no plan for digitizing the maps using Geographic Information System (GIS).
12. According to Borough representatives, the Licensed Operator of the collection system is James De Block of De Block Environmental Services, LLC. The Licensed Operator was not present at the time of the inspection, however, Robert J. De Block of De Block Environmental Services, LLC was present.

Pump Stations:

13. The Borough operates and maintains two (2) pump stations in the SSS (Molly Ann and Lakeside). According to Borough representatives, the Borough owns the Molly Ann Pump Station while the Lakeside Pump Station is owned by a Condo Association and the Borough took operational control of it. The Borough entered into an agreement on June 16, 2010 with the Condo Association, Inc. regarding the terms of operating the Lakeside Pump Station.
14. Both pump stations are equipped with alarm systems; mission communications which provides telephone voice notifications and Supervisory Control and Data Acquisition (SCADA) systems which provides voice and text notification directly to operations staff in the event of an alarm. Both stations are equipped with on-site backup power generators.
15. The Borough provided a daily handwritten operations and maintenance log which includes daily pump station inspections and a note of "ok" for status.

Flow Metering and Billing:

16. The Borough does not operate or maintain flow meters within the Borough's SSS. The Borough documents flow totalizer readings on daily basis in a handwritten log utilizing the PVSC owned and operated flow meter located at the Molly Ann Pump Station. According to Borough representatives, PVSC representatives collect the flow meter chart records on a weekly basis. At the time of the inspection, the flow was 0.901 MGD. According to flow records, the average flow for the Borough is 0.66 MGD.
17. According to Borough representatives, the SCADA system at the Molly Ann Pump Station is not utilized to electronically monitor flow because the timing is different with PVSC's flow meter and since PVSC's flow meter is used to bill the Borough, the Borough continues to use the totalizer readings documented on paper.
18. PVSC bills the Borough based on metered sanitary sewage flow rates on a quarterly basis. The Borough bills Urban Falls quarterly based on metered flow.
19. The intermunicipal agreement between PVSC and North Haledon states "It is understood and agreed that in no event shall the total flow or discharge from the lessee be in excess of an average of 1,000,000 gallons per day. It is further understood and agreed that lessees connection to the Commissioners system shall be constructed in such a manner as to limit the maximum rate of flow from the lessee pumping station to no more than a rate of 1,800,000 gallons per day".
20. The agreement with Urban Falls, Inc. states that the flow capacity from Urban Falls, Inc. into the Borough's system is 25,000 gallons per day.

SSO Discharges / Spills:

21. According to the NJDEP database and Borough Representatives, the Borough has experienced one (1) Sanitary Sewer Overflow (SSO) or spill in the past five (5) years within the collection system. According to Borough representatives, the SSO was due to a force main failure that occurred from February 22, 2015 to February 23, 2015 at the Molly Ann Pump Station. According to Borough representatives, this SSO did not result in a discharge of sanitary sewage to a waterbody. This SSO was reported to the NJDEP, however, the Borough was unable to provide documentation related to this SSO.
22. According to Borough representatives and documentation provided, De Block Environmental Services, LLC utilizes a form and procedure in response and reporting of sanitary sewer overflows and spills. However, a completed form for the SSO that occurred in 2015 noted above was not located by the Borough representatives.
23. Sanitary sewer system spills and overflows that enter the storm sewer system would discharge to the Molly Ann Brook and ultimately the Passaic River.

Residential Complaints / Collection System Insurance:

24. According to Borough representatives, the Borough documents response to residential complaints regarding sanitary sewage in the handwritten daily log along with routine maintenance and general operational statuses of the pump stations.
25. According to the Borough representative, the Borough maintains insurance for the collection system through the New Jersey Joint Insurance Fund (JIF).
26. According to Borough representatives, there are been no insurance claims made or paid as a result of SSOs or spills to affected property owners in the past five (5) years.

Collection System Maintenance:

27. According to Borough representatives, the Borough owns a jet/vac truck, lateral line cleaner, easement machine, push camera and bypass pump for collection system maintenance.
28. The Borough has developed a preventative maintenance program which includes monthly inspections and maintenance as necessary at known trouble spots within the collection system. According to Borough representatives, the Food Town supermarket is monitored by the Borough due to grease issues and the intersection of Spring Brook and Overlook Road is monitored by the Borough due to grease issues and the low grade of the pipes.
29. According to Borough representatives, the Borough coordinates identified and ongoing oil and grease issues with the Borough Health Department and PVSC for the inspection and enforcement of grease traps at commercial food establishments. The Borough Department of Public Works does not have a formal written Fats, Oils and Grease (FOG) program.
30. The Borough documents preventative maintenance in the handwritten daily log.
31. Borough Ordinance Chapter 479: Sewers, adopted on February 12, 1986, restricts the discharge of grease to the sewer system, specifically any water or waste containing fats, wax, grease or oils in excess of 100 milligrams per liter.
32. According to Borough representatives, monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken have not been sent to PVSC.

Inflow and Infiltration (I/I):

33. The Borough Ordinance Chapter 479: Sewers, adopted on February 12, 1986, prohibits inflow to the sanitary sewer, including any groundwater, roof runoff and subsurface drainage. Chapter 479 Article IX states that "Duly authorized employees of the Borough bearing proper credentials and identification shall be permitted to enter upon all properties for the purpose of inspection, observation, measurement, sampling and testing, in

accordance with the provisions of this chapter”. Chapter 479 Article XII includes enforcement and penalty provisions.

34. According to Borough representatives, in 2010 the Borough hired RedZone Robotics, Inc. to conduct an I/I study including metering flows and televising sanitary sewer lines, however, funding was cut and the program ceased in 2011 soon after it had started. At the time of the inspection, Borough representatives could not locate the findings of this study and were unaware of any completed activities associated with this program. According to Resolution #191-2010, adopted on July 21, 2010, the Borough accepted the RedZone Robotics, Inc. proposal at a cost of \$12,000.
35. According to Borough representatives, manhole disc inserts have been installed along High Mountain Road. However, Borough representatives were unable to estimate how many inserts have been installed or provide documentation of such installations. At the time of the inspection, EPA observed a pile of plastic manhole disc inserts located in the Molly Ann Pump Station not yet installed. In addition, EPA observed a manhole disc insert installed in the manhole located behind Food Town which is located on High Mountain Road.
36. According to Borough representatives, the Molly Ann Brook which runs along the east side of High Mountain Road overflows onto the road and is a potential source of inflow via submerged manholes. At the time of the inspection, EPA observed that the brook appeared to be at a similar elevation as High Mountain Road around the address 909 High Mountain Road.
37. At the Molly Ann Pump Station, the Borough has four (4) 500,000 gallon holding tanks, details are provided below:
 - a. All Borough sanitary sewage goes through the Molly Ann Pump Station.
 - b. According to Borough representatives, the Borough’s standard procedure is to open the valve to the holding tanks to allow flow to be pumped through a “T” shaped intersection where half the flow is diverted to the holding tanks and half continues to the PVSC regulator. However, it is possible to close the valve in the direction of the PVSC regulator to completely divert all Borough sanitary sewage flows into the holding tanks.
 - c. The valves used to divert the flow into the holding tanks are currently manually operated.
 - d. According to Borough representatives, the Borough has solicited quotes to automate the valve operations and received quotes at approximately \$37,000 for the valve and approximately \$14,000 for the SCADA system and other engineering.
 - e. Each of the four (4) tanks can be filled and emptied individually.
 - f. According to Borough representatives, the Borough’s standard procedure is to utilize primarily the first two (2), easternmost tanks where flow fills up first and then as necessary overflows into the second two (2) tanks.
 - g. The tanks are equipped with aerators for odor control.
 - h. All four (4) tanks are equipped with bar screens at the drainage point.
 - i. Use of the tanks is documented in the daily log.

- j. According to the daily log, the tanks were last used to store flow on February 24, 2016 to February 25, 2016. The daily log noted pump conditions and the position of the valves. Flow or total amount stored was not noted.
 - k. According to Borough representatives, the Fire Department is brought in to hose down and clean the tanks after each use. However, at the time of the inspection, the tanks had not been cleaned since they were last used in February 2016.
 - l. The Borough did not have a written Standard Operating Procedure (SOP) for the use and maintenance of these valves and holding tanks, at the time of the inspection.
 - m. According to Borough representatives, triggers for utilizing the holding tanks generally are flows greater than the Molly Ann pump station is designed to pump or can physically pump (the design average is 1 MGD and the peak flow capacity is 2.5 MGD) and when PVSC has requested it.
38. According to flow records between the weeks ending October 1, 2014 and September 30, 2015, the average flow for the Borough was 0.66 MGD. According to Borough representatives, the average wet weather flow is 0.8 MGD. According to flow records, the Borough averaged 1.208 MGD during the week ending on March 18, 2015 which was the highest documented flow during this time period.
39. Because the Borough's SSS consists entirely of PVC or ductile iron pipe, infiltration into the system is likely minimal.

Municipal Separate Storm Sewer System (MS4):

- 40. The Borough also operates and maintains the storm sewer system which consists of an estimated 1,023 catch basins.
- 41. The Borough Ordinance Chapter 479, adopted on February 2, 1986, prohibits illicit connections and discharges to the storm sewers.

Gathered Information:

- 42. At the time of the inspection, Borough representatives provided EPA with a copy of the following:
 - a. Written response to EPA's list of questions;
 - b. Vendor activity report for PVSC user fees and charges and quarterly invoices from 1/1/2014 to 12/31/2015; and
 - c. Public/Educational Entity Pollution Liability Insurance Policy.

II. Summary

Based on the information provided during the SSS CEI, the Borough of North Haledon SSS has not experienced any sanitary sewer overflows (SSOs) or spills in the collection system that resulted in discharges to waterbodies in the past five (5) years. However, at the time of the inspection EPA identified potential noncompliance with requirements of the New Jersey

Administrative Code (N.J.A.C.), see the Potential N.J.A.C. Non-Compliance section below for more details. In addition, North Haledon has the potential to significantly reduce and completely cease sanitary sewage flows into the PVSC regulator during wet weather events through inflow elimination and the use of two (2) million gallon capacity holding tanks, see the Areas of Concern / Recommendations section below for more details.

1. POTENTIAL N.J.A.C. NON-COMPLIANCE

At the time of the inspection, North Haledon and Licensed Operator representatives were unable to provide documentation demonstrating that the following N.J.A.C. requirements have been met by the Licensed Operator representing the Borough:

- a. North Haledon does not have an Operation and Maintenance (O&M) Plan for the collection system. The Licensed Operator is required by N.J.A.C. 7:10A-1.12(a)1 to develop and implement O&M procedures as required for the collection system, which should include at a minimum the following items:
 - i. Routine maintenance procedures;
 - ii. Proper operation techniques for the SSS;
 - iii. Emergency Plan and a Vulnerability Assessment;
 - iv. Preventative maintenance problem areas;
 - v. Pump Station operations and maintenance;
 - vi. Holding tank operations and maintenance;
 - vii. Available equipment;
 - viii. Responding to and reporting SSOs;
 - ix. Fats, Oils and Grease Program; and
 - x. Inspections and documentation.
- b. Monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken have not been sent to PVSC regarding the Borough's SSS. The Licensed Operator is required by N.J.A.C. 7:10A-1.12(b)2 to submit monthly operational reports to the receiving system.

2. AREAS OF CONCERN / RECOMMENDATIONS

- a. North Haledon should develop and implement a wet weather operating procedure where the holding tanks are utilized during wet weather events to store the Borough's sanitary sewage flow until after the wet weather event has ceased. Given that the Borough's sanitary sewage enters the PVSC regulator structure immediately upstream from the City of Paterson Short Street Combined Sewer Overflow (CSO) Outfall (022), utilizing the tanks for storage during wet weather would ensure that Borough sanitary sewage flow is treated at PVSC's WWTP and does not discharge out the CSO Outfall. The Borough has the ability with existing infrastructure to store all sanitary sewage flows from the Borough for up to two (2) days in the holding tanks (at an estimated one (1) MGD of flow in the two (2) MG capacity holding tanks).
- b. Based on flow records, the Borough SSS may have some sources of inflow contributing to higher wet weather flows compared to dry weather flows. The following are steps the Borough should consider to identify and eliminate sources of inflow into the system:

- i. Obtain and review I/I work already completed by RedZone Robotics, Inc in 2010 and 2011 and address and sources of I/I identified;
 - ii. Prevent/address Molly Ann Brook flooding onto High Mountain Road; and
 - iii. Utilize Ordinance Chapter 479 regarding Right of Entry to private residences to identify and utilize Ordinance Chapter 479 enforcement authority to eliminate illegal connections of inflow to the sanitary sewer system.
- c. The Borough SSS map provided at the time of the inspection was a series of scanned drawings dated “revised 1981”. The drawings depict manholes and pipe segments built prior to 1981. According to Borough representatives, portions of the SSS constructed after 1981 would be depicted in as-built drawings, plans or specifications and the Borough has no plan for digitizing the maps using Geographic Information System (GIS). The entire SSS should be mapped comprehensively in one map to aid in proper operation and maintenance of the system.

III. Field Work

1. Holding Tank Valves at Molly Ann Pump Station; a) force main and valve to PVSC; b) “T” intersection in force main, and c) valve to holding tanks (3 photographs);



a)



b)



c)

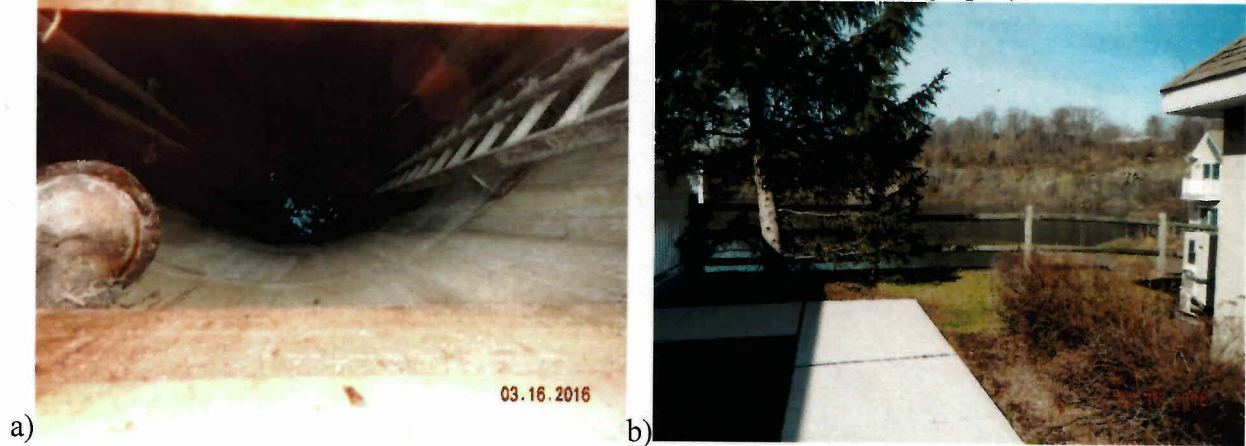
2. Molly Ann Pump Station; a) bar screen, and b) communitor (2 photographs);



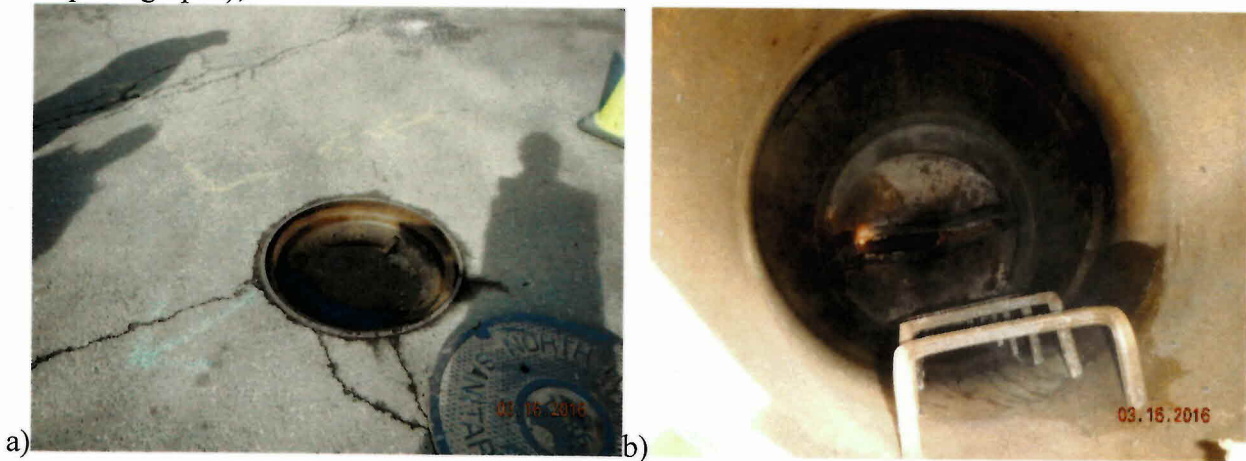
3. Molly Ann Pump Station; a) Holding Tanks, b) aerators, c) barscreen, and d) some vegetative growth (4 photographs);



4. Lakeside Pump Station; a) wet well, and b) adjacent pond (2 photographs);



5. Manhole behind FoodTown; a) with insert, b) no grease visible, steady flow in channel (2 photographs);



6. Manhole on Overlook Avenue at Spring Brook, downstream from restaurant, grease build up visible, heavy flow in channel (1 photograph);



